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16 *Attorneys for Plaintiff*

17 UNITED STATES DISTRICT COURT  
18 DISTRICT OF NEVADA

19 GREG JACOBI, derivatively on behalf of nominal  
20 defendant ECHOSTAR CORPORATION,

CASE NO. 2:12-CV-02075 -JAD-GWF

21 Plaintiff,

22 v.

23 CHARLES W. ERGEN, MICHAEL T. DUGAN,  
24 R. STANTON DODGE, ANTHONY M.  
25 FREDERICO, PRADMAN P. KAUL, TOM A.  
26 ORTOLF, C. MICHAEL SCHROEDER, JOSEPH  
27 P. CLAYTON and DAVID K. MOSKOWITZ,

28 Defendants,

and

ECHOSTAR CORPORATION,

Nominal Defendant.

**STIPULATION AND**  
**ORDER TO EXTEND RESPONSE**  
**DEADLINES TO DEFENDANTS'**  
**MOTION TO DISMISS THE**  
**AMENDED VERIFIED SHAREHOLDER**  
**DERIVATIVE COMPLAINT**  
*(First Request)*

29 Pursuant to Local Rules 6-1 and 7-1, Plaintiff Greg Jacobi ("Plaintiff"), by and through his  
30 counsel of record, and Defendants Echostar Corporation, Charles W. Ergen, Michael T. Dugan, R.  
31 Stanton Dodge, Tom A. Ortolf, C. Michael Schroeder, Joseph P. Clayton and David K. Moskowitz  
32 (collectively "Defendants"), by and through their counsel of record, hereby stipulate and agree, subject  
33 to the Court's approval, that the time for Plaintiff to file a Response to Defendants' Motion to Dismiss

1 the Amended Verified Shareholder Derivative Complaint ("Motion to Dismiss") shall be extended as  
2 set forth below, and in support thereof state as follows:

- 3 1. Defendants filed a Motion to Dismiss (Doc. No. 50) on May 7, 2015;
- 4 2. Plaintiff's Response to Defendants' Motion to Dismiss is currently due on May 26, 2015;
- 5 3. The parties agree that Plaintiff shall have until May 29, 2015 to file his Response to  
6 Defendants' Motion to Dismiss;
- 7 4. The parties agree that Defendants shall have until June 12, 2015 to file their Reply to  
8 Defendants' Motion to Dismiss;
- 9 5. This stipulation is made in good faith and is not sought for delay or any improper  
10 purpose; and
- 11 6. This is the parties' first request for an extension of time.

12 WHEREFORE, the parties hereby stipulate and respectfully request that the Court enter an Order  
13 extending the time for Plaintiff to file his Response to Defendants' Motion to Dismiss to May 29, 2015  
14 and extending the time for Defendants to file their Reply to Defendants' Motion to Dismiss to June 12,  
15 2015.

16 Dated this 26<sup>th</sup> day of May, 2015.

17 **ALDRICH LAW FIRM, LTD.**

18 /s/ John P. Aldrich  
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*Attorneys for Defendants*

**ORDER**

25 IT IS SO ORDERED.

26 Dated: May 26, 2015.

27   
28 UNITED STATES DISTRICT JUDGE